The Honorable James L. Robart 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE CAROLINE ANGULO, a single person, ERIC KELLER, a single person, ISABEL LINDSEY 10 and CHARLES LINDSEY, a married couple, No. 2:22-cv-00915-JLR and CHRISTINE BASH, individually and as a 11 personal representative of the ESTATE OF STIPULATED MOTION AND [PROPOSED] ORDER TO STEVEN BASH, 12 EXTEND DEADLINE TO Plaintiffs, SUBMIT JOINT STATEMENT 13 v. 14 NOTE ON MOTION CALENDAR: PROVIDENCE HEALTH & SERVICES -June 16, 2023 15 WASHINGTON, a non-profit Washington corporation, also d/b/a PROVIDENCE ST. 16 MARY MEDICAL CENTER; DR. JASON A. DREYER, D.O., and JANE DOE DREYER, 17 husband and wife and the marital community thereof; DR. DANIEL ELSKENS, D.O., and 18 JANE DOE ELSKENS, husband and wife and the marital community thereof; and JOHN/JANE 19 DOES 1-10, and any martial communities thereof. 20 Defendants. 21 22 STIPULATED MOTION 23 In its Order dated May 15, 2023, the Court directed the parties to file a joint statement by June 16, 2023, discussing their proposals for the jurisdictional discovery process and remaining 24 25 areas of dispute. Dkt. 79 at 11. The Parties have worked diligently to prepare their joint statement, but Providence's proposed administrator for the jurisdictional process (Angeion 26 27

STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT (2:22-cv-00915-JLR)

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Group) withdrew its bid to serve as administrator on the morning of this filing. Given Angeion Group's withdrawal and Providence's need to propose alternative administrator(s), the Parties 2 request additional time to revise their joint statement for submission. Accordingly, the Parties 3 ask that the Court extend the deadline for the Parties to file their joint statement to no later than 4 5 June 21, 2023. IT IS SO STIPULATED 6 RESPECTFULLY SUBMITTED this 16th day of June, 2023. 7 8 DAVIS WRIGHT TREMAINE LLP GILBERT LAW FIRM, P.S. Attorneys for Defendant Providence Health & Attorneys for Plaintiffs Services – Washington 10 By s/Ross Siler By <u>s/Beth M. Bollinger</u> 11 Kenneth E. Payson, WSBA #26369 William A. Gilbert, WSBA #30592 Ross Siler, WSBA #46486 Beth M. Bollinger, WSBA #26645 12 Olivia M. Powar, WSBA #59504 421 W. Riverside Avenue, Suite 353 Spokane, WA 99201 920 Fifth Avenue, Suite 3300 13 Seattle, WA 98104-1610 Telephone: (509) 321-0750 14 Telephone: (206) 622-3150 Email: bill@wagilbert.com Email: kenpayson@dwt.com beth@wagilbert.com 15 ross.siler@dwt.com oliviapowar@dwt.com 16 WITHERSPOON BRAJCICH MCPHEE, ETTER, MCMAHON, LAMBERSON, 17 **PLLC** VAN WERT & ORESKOVICH, P.C. Attorneys for Defendants Jason Dreyer, DO Attorneys for Defendants Daniel Elskens, DO 18 and Jane Doe Dreyer and Jane Doe Elskens 19 By s/Ryan M. Beaudoin By s/Ronald A. Van Wert Ryan M. Beaudoin, WSBA #30598 20 Stephen M. Lamberson, WSBA #12985 Jeffrey R. Galloway, WSBA #44059 Ronald A. Van Wert, WSBA #32050 21 James A. McPhee, WSBA #26323 618 W. Riverside Avenue, Suite 210 Bryce J. Wilcox, WSBA #21728 Spokane, WA 99201 22 Steven J. Dixson, WSBA #38101 Telephone: (509) 747-9100 601 W. Main Avenue, Suite 1400 Email: lambo74@ettermcmahon.com 23 Spokane, WA 99201-0677 rvw@ettermcmahon.com Telephone: (509) 455-9077 24 Email: rbeaudoin@workwith.com 25 igalloway@workwith.com imcphee@workwith.com 26 bwilcox@workwith.com 27

STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT (2:22-cv-00915-JLR)

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LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main 206.757.7700 fax

1	[PROPOSED] ORDER		
2	It is so ordered.		
3		day of	2022
4	DATED tills	day 01	, 2023.
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6			THE HONORABLE JAMES L. ROBART UNITED STATES DISTRICT JUDGE
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STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT (2:22-cv-00915-JLR)

CERTIFICATE OF SERVICE

I hereby certify that on this day, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED: June 16, 2023

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s/ Ross Siler Ross Siler, WSBA #46486

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